

**MEMO**

To: Jim Christiansen

From: Paul Lammers

Date: June 4, 2004

Re: Comments to Flyway Site Removal Action Work Plan

Section 3: Summary of Work Planned for 2004

Sect. 3.1.8: re: Placement of river run gravel in excavated areas. What is the proposed source of this material? Will it be sampled? Will any EPA oversight or duplicate sampling be performed at the source?

Re: EPA designated rip-rap. Has EPA so designated any rip-rap? What is the proposed source?

Section 3.2.7: re: Transformer Removal and Disposal: Does EPA have burden of proving presence of PCBs at the pole mounted transformer area or does Grace have burden of proving absence of PCBs in the area? Is this an issue of importance to EPA?

Section 5: Figure 5.1: Project Schedule: re: site kick off meeting. When and where is the meeting? Will EPA oversight contractor be at the meeting?

Appendix A: Health and Safety Plan

CDM comments to the Appendix A were submitted to EPA by CDM's Health & Safety staff under separate cover.

Appendix B: Quality Assurance Project Plan

Figure 1.1: Project Management Organization Chart: re: Who are the Data Validators? Is this the EPA oversight contractor? Is communication with the EPA oversight contractor the responsibility of any particular member of the Project Management team? (see further comments below re: project management's responsibility for communication with EPA oversight contractor).

Re: Project Manager's daily management responsibilities: Should daily communication with and reporting to EPA's oversight contractor (i.e. regarding work to be conducted that day, coordinating oversight sampling activities, duplicate sampling, etc.) be added as a responsibility? Should similar communication responsibilities be added to the list for the Project Quality Assurance Coordinator, the Sample Coordinator and Air Monitoring Manager, and the Health & Safety Officer?

Section 2.1: Page B-2-1: re: statement that no work efforts will be conducted in the Riverbank area; this area has already been remediated. Comment: Figure 2-1 shows the following grids along the riverbank as "grids requiring removal": A2, B2, C2, D2, E2, F2, G2, H2, H3, O3, P3, Q3. Note: Statements elsewhere in the Work Plan acknowledge that contaminated soils along the Riverbank will be addressed.

Section 2.1: Page B-2-1: re: statement that no PCB soil was found in the transformer area "according to EPA soil sample results". Is Grace aware of any differing data? Should Grace be obligated to prove absence of PCBs?

Section 2.3.1: Page B-2-4: re statement that "during removal activities, the potential for LA fibers to migrate offsite increases." Comment: The potential for LA fibers to migrate to other grid areas within the Flyway that have been previously been sampled as "clean" also increases. The Work Plan does not address potential cross-contamination of these "clean" grids.

Table 2.1: Comment: This table does not propose Alternative Actions to clean up any potential contamination of off-site areas or "clean" grids.

Section 2.3.3 Inputs to the Decision: Page B-2-8: re: statement that "confirmation soil samples will not be ground as in previous characterization studies and will be analyzed via PLM". Also, "analyses will generally be performed onsite at EMSL's Libby lab to ensure expedited results". Comment: Is EPA ok with both of these statements?

Table 2-2: Inputs to the Decision: Page B-2-9: **NOTE:** CDM review of this Work Plan and these comments do not include analysis of the technical information set forth in this table.

Table 2-3: Study Boundaries: Page B-2-12: Comment: The "smallest sub-population" column does not include the definition of work activities for which air sampling will be conducted on a weekly basis.

Table 2-4: Decision Rule: Page B-2-14: **NOTE:** CDM review of this Work Plan and these comments do not include analysis of the technical information set forth in this table.

Table 2-5: Limits on Decision Errors: Page B-2-17: **NOTE:** CDM review of this Work Plan and these comments do not include analysis of the technical information set forth in this table.

Section 2.3.7: Optimize the Design for Obtaining Data: Page B-2-18: re: last sentence on page. Comment: recommend that language be added that all modifications or addenda must be "approved by EPA" prior to making the proposed changes.

Section 5: Assessment and Oversight: Page B-5-1 (et. seq.) Comment: As set forth in this Work Plan in general, and in this Section in particular, EPA is responsible for working closely with Grace on the project and EPA is responsible for ensuring that the

work meets the requirements set forth in the approved legal and technical documents. There is no statement that Grace is responsible for communicating with and coordinating with EPA and EPA's oversight contractor.

Appendix C: Sampling and Analysis Plan

Section 1.2: Project Management: Comment: same as above regarding lack of written commitment or obligation to communicate and coordinate with EPA and EPA oversight contractor.

Section 7.1: Mobilization: Page C-7-1: Comment: The list of attendees at the proposed "field planning meeting" does not include EPA or EPA's oversight contractor.

NOTE: CDM will conduct further review of the Sampling and Analysis Plan and provide further comment to EPA (if necessary) as soon as possible.

Appendix D: Dust Control

Section 8: Materials for Dust Control: re: statement that magnesium chloride may be added to the water trucks if necessary for dust control purposes. Comment: Is magnesium chloride appropriate for use on the river banks or in other areas of close proximity to the Kootenai River?

Appendix E: Erosion Control Plan

Section 1: Introduction: Page E-1-1: re: statement that the Erosion Control Plan contains four (4) Figures (1, 2, 3, and 4) that will be used as a guide for installing erosion and sediment control measures. Comment: No figures or drawings were included in the copy of the Erosion and Control Plan submitted for review. These onsite details of location and placement have not been included in the plan.